

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

UNITED STATES OF AMERICA

vs.

No. 4:15-CR-153-O

SHANDA BRITE (04)

FACTUAL RESUME

PLEA:

Count One: Maintaining a Drug Involved Premises (methamphetamine)  
(in violation of 21 U.S.C. § 856(a)(1))

Penalties: The penalties the Court can impose include:

- a. imprisonment for a period of not more than 20 years;
- b. a fine not to exceed \$500,000, or twice any pecuniary gain to the defendant;
- c. a term of supervised release not to exceed 3 years, which must follow any term of imprisonment. If Defendant violates the conditions of supervised release, he could be imprisoned for the entire term of supervised release;
- d. a mandatory special assessment of \$100;
- e. restitution to victims or to the community, which may be mandatory under the law, and which Defendant agrees may include restitution arising from all relevant conduct, not limited to that arising from the offense of conviction alone; and
- f. costs of incarceration and supervision.

ESSENTIAL ELEMENTS OF THE OFFENSES:

To establish the offense alleged in the Superseding Information, the Government must prove the following element(s) beyond a reasonable doubt:

That the defendant knowingly used any place, permanently or temporarily, for the purpose of distributing or using any controlled substance.

STIPULATED FACTS:

Since approximately September 2014, Shanda Brite has allowed others, such as Erica Ayala and Miguel Bonilla, to conduct methamphetamine transactions at her house, xxxx Seal Cove, Fort Worth, Texas. In exchange, Shanda Brite received methamphetamine. Therefore, Shanda Brite used her home, located at xxxx Seal Cove, Fort Worth, Texas, for the purpose of distributing methamphetamine.

SIGNED on this 16<sup>th</sup> day of July, 2015.

  
SHANDA BRITE  
Defendant

  
ANDREW OTTAWAY  
Attorney for Defendant